

N 2 7 2003 CONNECTICUT SITING COUNCIL

CONNECTICUT SITING COUNCIL REVIEW

DOCKET NO.: F-2008

JUNE 26, 2008

OF THE TEN-YEAR FORECAST OF

CONNECTICUT ELECTRIC LOADS AND

RESOURCES

LAKE ROAD GENERATING COMPANY, L.P.'S RESPONSES TO INTERROGATORIES OF THE CONNECTICUT SITING COUNCIL

Lake Road Generating Company, L.P. ("Lake Road") hereby files this response to the Interrogatories received from the Connecticut Siting Council dated June 11, 2008.

INTERROGATORY NO. 1:

Listed below are the data from the June 2008 ISO-NE Seasonal Claimed Capability Report. Does the Lake Road Generating Co. L.P. (Lake Road) agree with these numbers? If no, provide the correct data.

Net Capability – MW	<u>Summer</u>	<u>Winter</u>
Lake Road 1	232.75	268.37
Lake Road 2	251.33	286.95
Lake Road 3	254.90	283.67

RESPONSE: Yes.

INTERROGATORY NO. 2:

How does Lake Road compute seasonal claimed capability?

<u>RESPONSE</u>: Lake Road computes seasonal claimed capability per the ISO-NE Installed Capacity Procedure Manual M-20, Attachment D.

INTERROGATORY NO. 3:

Is the Lake Road facility considered a baseload, intermediate, or peaking facility?

RESPONSE: Intermediate.

INTERROGATORY NO. 4:

Do any of the Lake Road generating units have black start capability? If yes, specify which ones.

RESPONSE: No.

INTERROGATORY NO. 5:

Identify units that are capable of operating on fuel oil, and explain the contingency plan to operate other unit(s).

<u>RESPONSE</u>: Unit 1 is capable of operating on fuel oil. Both Units 2 & 3 will require a 30-day outage to commission, and install OEM dual fuel software and hardware to safely operate the units on fuel oil. After commissioning is completed stack testing must be completed per the facility's air permit for each unit.

INTERROGATORY NO. 6:

Has Lake Road recently performed or considered any upgrades that would allow all or more of Lake Road's generating capacity to be considered Connecticut capacity?

<u>RESPONSE</u>: Lake Road considered investing in the elective transmission upgrades required to locate Unit 2 in Connecticut which would have enabled the unit to participate in the LFRM. Based on NU project estimates Lake Road decided not to proceed with the transmission upgrades.

INTERROGATORY NO. 7:

Does Lake Road have plans to add generation? If so, would the unit primarily operate on natural gas with the capability to use fuel oil? Has Lake Road studied future fuel availability for both gas and oil? If so, provide an executive summary and conclusions.

<u>RESPONSE</u>: Lake Road is contemplating the addition of a fourth unit at the site should markets, including the ISO-New England Forward Capacity Market, begin to indicate that the cost to add a new unit would be supported by the market. Based on recent auction results, Lake Road does not anticipate that prices in the New England region will support new generation until 2015 or beyond and Lake Road has modified its planning horizon for the expansion accordingly.

To assure that the operation of this contemplated combined cycle unit will result in the lowest emissions feasible, it will fire natural gas fuel only. In its planning for this unit, Lake Road considered adding backup ultra low sulfur fuel diesel ("ULSD") fuel burning capability. Lake Road ultimately concluded, however, that this unit should operate only on natural gas in order to minimize emissions, and in light of Lake Road's determination that it was more feasible to rely on the ULSD burning capability of the other units at the generation station. Currently, LRGS has the capability to generate approximately 264 MW of electricity using ULSD. As Units 2 and 3 are commissioned on ULSD, this capability can increase to almost 800 MW. Also, in planning work with the Town of Killingly commissions, and neighborhood groups regarding the possibility of adding the fourth unit, the commissions and neighbors indicated their desire to have no increase in oil burning capability be implemented at an expanded Lake Road facility.

In terms of natural gas availability, Lake Road is a subsidiary of BG Group, a major worldwide natural gas company that performs its business in the full value chain of natural gas. BG Group is a major entity in worldwide exploration and production of natural gas, in liquefaction of natural gas for storage and delivery as LNG, in shipping of LNG, in regasification of LNG for delivery of natural gas to pipeline and distribution systems worldwide and for end user marketing and natural gas generation production. Because BG Group is an integrated major gas company, it provides a significant advantage to Lake Road's generation portfolio in sourcing natural gas for the project. BGNA will manage the supply and delivery of natural gas to LRGS Unit 4 from its natural gas trading and marketing organization at its Houston headquarters. BGNAs natural gas supply to the United States comes predominantly from its LNG imports through its firm capacity contracts in two LNG terminals, one in Lake Charles, Louisiana, and the other at Elba Island near Savannah, Georgia. BGNA imported approximately 50% of the total LNG imports into the United States in 2006 and 55% in 2007, and has the flexibility to move natural gas to support its business interests via its pipeline capacity positions which allow delivery of regasified LNG

to the various points of usage throughout the United States such as the Lake Road facility. BGNA will secure the appropriate capacity across such pipelines in order to source the Lake Road expansion.

<u>WITNESS(ES):</u> Robert B. Haley, General Manager, Lake Road Generating Co. and Michael Kirkwood, Director Business Development, BG Americas and Global LNG.

Respectfully Submitted,

LAKE ROAD GENERATING COMPANY, L.P.

By

Mark R. Sussman Loni S. Gardner Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street

Hartford, Connecticut 06103-3469 Telephone: (860) 240-6000

Its Attorneys

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and sent by email this 26th day of June, 2008 to:

Judith E. Lagano NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457

Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469

Stephen Gibelli, Esq. Senior Counsel Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037

Michael A. Coretto The United Illuminating Company 157 Church Street New Haven, CT 06506-1904

Bruce L. McDermott, Esq. Wiggin & Dana LLP One Century Tower New Haven, CT 06508-1832 Raymond G. Long NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457

Christopher R. Bernard Manager – Regulatory Policy Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037

Linda L. Randell Senior Vice President General Counsel and Corporate Secretary UIL Holdings Corporation P.O. Box 1564 New Haven, CT 06506-0901

Maurice R. Scully, Executive Director Connecticut Municipal Electric Energy Cooperative 30 Stott Avenue Norwich, CT 06360-1526

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-8345 Charles J. Carpinella Load and Generation Analyst Connecticut Municipal Electric Energy Cooperative 30 Stott Avenue Norwich, CT 06360-1526

Daniel A. Weekley Managing Director Northeast Government Affairs Dominion Resources Services, Inc. Rope Ferry Road (Route 156) Waterford, CT 06385

James A. Ginnetti Vice President, External Affairs FirstLight Power Resources Services, LLC 20 Church Street, 16th Floor Hartford, CT 06103

Anthony M. Macleod Whitman Breed Abbott & Morgan LLC 100 Field Point Road Greenwich, CT 06830

Eric Johnson External Affairs ISO New England Inc. One Sullivan Road Holyoke, MA 01040 Lillian M. Cuoco, Esq. Senior Counsel Dominion Resources Services, Inc. RS 2 120 Tredegar Street Richmond, VA 23219

Donna M. Poresky, Esq. Senior VP, Secretary and General Counsel FirstLight Power Resources Services, LLC 20 Church Street, 16th Floor Hartford, CT 06103

Kevin Flynn, Esq. Regulatory Counsel ISO New England Inc. One Sullivan Road Holyoke, MA 01040

CEAB c/o Gretchen Deans CERC 805 Brook Street Rocky Hill, CT 06067

Dan Peaco La Capra Associates 20 Winthrop Square Boston, MA 02110 John Mengacci Under Secretary Office of Policy and Management Chairman, CEAB 450 Capitol Avenue Hartford, CT 06106

Heather Hunt Law Office of Heather Hunt 242 Whippoorwill Lane Stratford, CT 06614

Robert Price Plant Manager AES Thames LLC 141 Depot Road Uncasville, CT 06382 Alvaro E. Pereira, Ph.D. Consultant La Capra Associates 20 Winthrop Square, 3rd Floor Boston, MA 02110

Robert B. Haley Lake Road Generating Company, L.P. 56 Alexander Parkway Dayville, CT 06241

Mark Sussman Sarah P. Kowalczyk Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469

Loni S. Gardner